## IN THE UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF WEST VIRGINIA CHARLESTON DIVISION

IN RE: ETHICON, INC. PELVIC REPAIR SYSTEMS PRODUCTS LIABILITY

LITIGATION

ETHICON ELECTION WAVE CASES

LISTED IN EXHIBIT A

Master File No. 2:12-MD-02327 MDL 2327

JOSEPH R. GOODWIN U.S. DISTRICT JUDGE

## NOTICE OF ADOPTION OF PRIOR WAVE 4 DAUBERT REPLY REGARDING PAUL J. MICHAELS, M.D. FOR ELECTION WAVE

Comes now, the Defendants, and hereby adopt and incorporate by reference the Daubert reply filed in relation to Paul J. Michaels, M.D. for Ethicon Wave 4 [Dkt. #3814]. Defendants respectfully request that the Court exclude Dr. Michael's testimony for the reasons expressed in the Wave 4 briefing.

Dated: December 27, 2018

Respectfully submitted,

/s/ Susan M. Robinson

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COUNSEL FOR DEFENDANTS ETHICON, INC. AND JOHNSON & JOHNSON

## **CERTIFICATE OF SERVICE**

I hereby certify that on December 27, 2018, I electronically filed the foregoing document with the Clerk of the court using CM/ECF system which will send notification of such filing to the CM/ECF participants registered to receive service in this MDL.

/s/ Susan M. Robinson

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